

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	INFORMATION CR 16-184 RHK
)	
v.)	18 U.S.C. § 2
)	18 U.S.C. § 982
MICHAEL LAMONT HUGHES,)	18 U.S.C. § 1344
)	21 U.S.C. § 853
Defendant.)	
)	

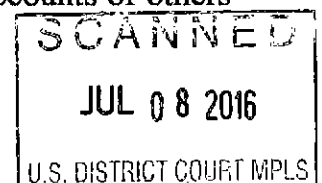
THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1
(Bank Fraud)

1. On or about May 31, 2012, in the State and District of Minnesota, Defendant,
MICHAEL LAMONT HUGHES,
aiding and abetting and being aided and abetted by others known and unknown, did knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution and to obtain the money and funds owned by and under the custody and control of a financial institution by means of material false and fraudulent pretenses, representations, and promises.

Manner and Means of the Scheme

2. Defendant, aided and abetted by others known and unknown, obtained counterfeit checks that were created with victims' stolen bank account information, and also worthless checks - such as those that were drawn from the closed accounts of others



– in order to conduct fraudulent transactions. Defendant then conducted fraudulent transactions at financial institutions and businesses using the counterfeit or worthless checks, and he recruited others who would do the same, in order to obtain money and merchandise through the negotiation of the checks. Defendant and others then converted the proceeds of the fraudulent transactions to their own use.

3. In furtherance of the scheme to defraud, on or about May 31, 2012, in the State and District of Minnesota, Defendant and another individual who was aiding and abetting him, “M.K.,” drove a third individual, “A.B.,” to three separate U.S. Bank branches so that A.B. could deposit counterfeit checks into A.B.’s checking account at U.S. Bank and withdraw cash from those deposits. Defendant had met A.B. approximately one week prior, at a blood bank, and recruited A.B. to negotiate counterfeit checks. Defendant then contacted others, including M.K., to obtain counterfeit checks for A.B. to cash.

4. The first two counterfeit checks that Defendant and M.K. provided A.B. to deposit on May 31, 2012, purported to be drawn from the Bank of Rochester account held by NDA Marketing, Inc., and were made payable to A.B. Check number 1138 was in the amount of \$875.59 and check number 1139 was in the amount of \$864.72. A.B. was able to withdraw \$500 from his account after depositing each check, and he shared these funds (totaling \$1,000) with Defendant and M.K. Defendant and M.K. then drove A.B. to a third U.S. Bank branch, where A.B. attempted to deposit a third check, which was numbered 1140 in the amount of \$4,368.27 purporting to be drawn from an account at Wells Fargo Bank held in the name of Westfall Auto Sales and made payable to A.B.

A.B. was arrested while inside the bank attempting to cash the third check. Defendant and M.K., who had remained in the parking lot in their vehicle, drove away from the scene.

All in violation of Title 18, United States Code, Sections 1344 and 2.

FORFEITURE ALLEGATIONS

Count 1 of this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2)(A).

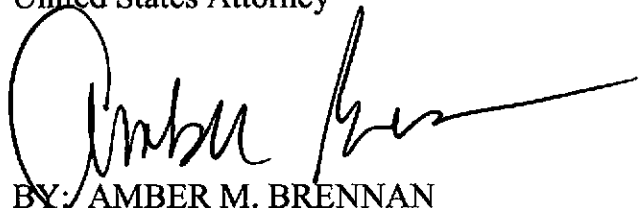
As the result of the offenses alleged in Count 1 of this Information, Defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(A) any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violations.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

Dated:

7/8/16

ANDREW M. LUGER
United States Attorney

A handwritten signature in black ink, appearing to read "Amber M. Brennan", with a long horizontal flourish extending to the right.

BY: AMBER M. BRENNAN
Assistant U.S. Attorney
Attorney ID No. 285961